

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	§
		Chapter 11
	§	
AUDACY, INC., <i>et al.</i> ,	§	Case No. 24-90004 (CML)
	§	
	§	(Jointly Administered)
Debtors. ¹	§	§
	§	

**DEBTORS' AGENDA OF MATTERS SET FOR HEARING
ON FEBRUARY 20, 2024 AT 2:30 P.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file this Agenda of Matters set for *hybrid hearing* on **February 20, 2024 at 2:30 p.m. (prevailing Central Time)** (the “Hearing”) before the Honorable Judge Christopher M. Lopez, United States Bankruptcy Judge, Courtroom 401, 515 Rusk Street, Houston, Texas 77002:

A. Motion

- 1. Debtors' *Emergency Motion for Entry of an Order (I) Approving Sale of Certain Assets to ATS-Needham LLC, (II) Approving Related Easement Agreement, and (III) Granting Related Relief* [Docket No. 232]**

Related Documents:

- Declaration of Richard J. Schmaeling in Support of Debtors' Emergency Motion for Entry of an Order (I) Approving Sale of Certain Assets to ATS-Needham LLC, (II) Approving Related Easement Agreement, and (III) Granting Related Relief [Docket No. 274]

Status: Going forward.

- 2. Debtors' *Emergency Motion for Entry of an Order (I) Approving Sale of Real Estate Property, Free and Clear of All Liens, Claims, Encumbrances, and Interests to 83 Leo Property Owner LLC, (II) Approving Purchase and Sale Agreement, Related***

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://dm.epiq11.com/Audacy>. The location of the Debtors' corporate headquarters and service address for purposes of these chapter 11 cases is: 2400 Market Street, 4th Fl, Philadelphia, PA 19103.

Lease Agreement, and Intercreditor Agreement, and (III) Granting Related Relief [Docket No. 233]

Related Documents:

- Declaration of Richard J. Schmaeling in Support of Debtors' Emergency Motion for Entry of an Order (I) Authorizing Sale of Real Estate Property, Free and Clear of All Liens, Claims, Encumbrances, and Interests to 83 Leo Property Owner LLC, (II) Approving Purchase and Sale Agreement, Related Lease Agreement, and Intercreditor Agreement, and (III) Granting Related Relief [Docket No. 275]

Status: Going forward.

3. Debtors' *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Authorizing the Use of Cash Collateral, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing* [Docket No. 18]

Related Documents:

- *Signed* Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Authorizing the Use of Cash Collateral, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing [Docket No. 79]
- Notice of DIP Syndication Mechanics [Docket No. 90]
- Amended Notice of DIP Syndication Mechanics [Docket No. 94]
- Notice of Filing of Final Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Authorizing the Use of Cash Collateral, and (IV) Modifying the Automatic Stay [Docket No. 214]
- Notice of Filing of Revised Final Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Authorizing the Use of Cash Collateral, and (IV) Modifying the Automatic Stay [Docket No. 266]

Status: Going Forward.

4. Debtors' *Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Certain Debtors to Continue Selling, Contributing and Servicing Receivables and Related Rights Pursuant to the Securitization Program, (II) Modifying the*

Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 21]

Related Documents:

- *Signed* Interim Order (I) Authorizing Certain Debtors to Continue Selling, Contributing and Servicing Receivables and Related Rights Pursuant to the Securitization Program, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 80]
- Notice of Filing of Final Order (I) Authorizing Certain Debtors to Continue Selling, Contributing and Servicing Receivables and Related Rights Pursuant to the Securitization Program, (II) Modifying the Automatic Stay, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 215]

Status: Going Forward.

5. Disclosure Statement for the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 25]

Responses Received:

- None.

Related Documents:

- See below.

Status: Going Forward.

6. Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 24]

Responses Received:

- Letter from Alan Adams [Docket No. 229]
- Reservation of Rights of the Screen Actors Build-American Federation of Television and Radio Artists to the Debtors' Motion for Confirmation of the Plan of Reorganization [Docket No. 246]
- Landlord 5670 Wilshire Owner LLC's Limited Objection to Joint Prepackaged Plan of Reorganization for Audacy, Inc. and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 249]
 - This objection is resolved by the inclusion of agreed language in the proposed Confirmation Order [Docket No. 278].

- Oracle America, Inc.'s Cure Objection and Reservation of Rights Regarding Debtors' Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 254]
 - This objection has been withdrawn. [Docket No. 265]

Related Documents:

- Disclosure Statement for the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 25]
- Order Scheduling (I) Combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of Plan; (II) Fixing Deadline to Object to Disclosure Statement and Plan; (III) Approving (A) Solicitation Procedures, (B) Form and Manner of Notice of Commence, Combined Hearing, and Objection Deadline, and (C) Notice of Non-Voting Status and Opt Out Opportunity; (IV) Conditionally Approving Disclosure Statement; (V) Conditionally (A) Directing the United States Trustee Not to Convene Section 341 Meeting of Creditors and (B) Waiting Requirement of Filing Statements of Financial Affairs and Schedules of Assets and Liabilities; and (VI) Granting Related Relief [Docket No. 82]
- Verification of Publication, dated January 17, 2024 [Docket No. 149]
- Certificate of Service, dated January 18, 2024 [Docket No. 157]
- Certificate of Service, dated January 23, 2024 [Docket No. 168]
- Notice of Filing of Plan Supplement for the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and its Affiliate Debtors under Chapter 11 of the Bankruptcy Code, together with certain Plan Supplement Documents [Docket No. 216]
- Proposed Order Approving Debtors' Disclosure Statement and Confirming Debtors' Joint Prepackaged Plan of Reorganization [Docket No. 217]
- Notice of Filing of First Supplement to the Plan Supplement for the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 255]
- Declaration of Roger Meltzer in Support of Confirmation of the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 267]

- Debtors' Witness and Exhibit List [Docket No. 268]
- Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC Regarding The Solicitation And Tabulation of Ballots Cast on the Debtors' Chapter 11 Plan [Docket No. 270]
- Declaration of William Evarts (PJT Partners LP) in Support of Confirmation of the Debtors' Chapter 11 Plan [Docket No. 271]
- Declaration of Heath C. Gray (FTI Consulting, Inc.) in Support of Confirmation of the Debtors' Chapter 11 Plan [Docket No. 272]
- Debtors' Memorandum of Law in Support of (I) Approval of the Disclosure Statement and (II) Confirmation of the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 273]
- Debtors' Supplemental Witness and Exhibit List [Docket No. 276]
- Notice of Filing of Revised Proposed Order Approving Debtors' Disclosure Statement and Confirming Debtors' Joint Prepackaged Plan of Reorganization [Docket No. 278]
- Notice of Filing of Second Supplement to the Plan Supplement for the Joint Prepackaged Plan of Reorganization for Audacy, Inc. and Its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code [Docket No. 279]

Status: Going forward.

Dated: February 19, 2024

Respectfully submitted,

/s/ John F. Higgins

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Proposed Counsel to the Debtors and Debtors in Possession

² Not admitted to practice in Illinois. Admitted to practice in New York.

Certificate of Service

I certify that on February 19, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins
John F. Higgins